

STIKEMAN ELLIOTTClaim Objections under 37 CFR 1.75(c)

In response to the Examiner's objections to claims 20-24 under 37 CFR 1.75(c), claims 20-24 have been made dependant on only one claim.

Allowable Subject Matter

The Applicant thanks the Examiner for the allowance of claim 15 and the indication of allowability of claims 2-14, 16-17 and 19 if re written in independent form.

Claim Rejections - 35 U.S.C. § 102

The Applicant notes the Examiner's objections to claims 1 and 18 under 35 U.S.C. (102)(e) as being anticipated by Foote et al. (US 2002/0028021).

Foote describes a method of classifying individual images within a video into a class of images. The object of Foote is to cluster similar frames from a video to facilitate video browsing and searching.

The method described in Foote uses Discrete Cosine Transforms ("DCT") or Hadamard Transforms ("HT") as a conversion to a feature vector representation of the frame data. In contradistinction, the Applicant's method does not use DCT or HT to classify an Internet object or an object stored on computer-readable media.

Claim 1 of the present application includes the steps of computing the following eight coefficients:

- (i) a descriptor coefficient,
- (ii) a name coefficient,
- (iii) a text coefficient,
- (iv) an image coefficient,
- (v) an audio coefficient,
- (vi) a video coefficient,
- (vii) a plug-in coefficient, and
- (viii) a relational coefficient.

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Although Foote teaches the computation of transform coefficients from video features (using DCT or HT, which methods are not used in the Applicant's method (see previous discussion)), Foote does not teach the computing of the eight coefficients as specified in Applicant's claim 1. Foote therefore, does not anticipate Applicant's claim 1.

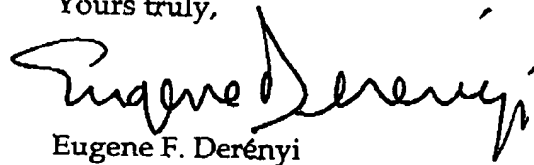
Claim 18 includes the steps of computing four coefficients as follows:

- (i) a text coefficient,
- (ii) the image coefficient,
- (iii) the audio coefficient,
- (iv) the video coefficient.

Although Foote teaches the computation of transform coefficients from video features (using DCT or HT, which methods are not used in the Applicant's method (see previous discussion)), Foote does not teach the computing of the four coefficients as specified in Applicant's claim 18. Foote therefore, does not anticipate Applicant's claim 18.

Reconsideration of the Examiner's rejection of claims 1 and 18 is requested in light of the distinctions between claims 1 and 18 and the teachings of Foote.

Yours truly,



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